

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

DOMINIC GAGLIARDOTTO,)	
)	
Plaintiff,)	
vs.)	Case No. 20-cv-06516
)	
GOOSE LAKE DEVELOPMENT, INC. d/b/a)	Hon. Sara Ellis
GLD, INC. and DRAGAN JOVANOVIĆ,)	
individually,)	
)	
Defendants.)	

JOINT STIPULATION AND MOTION TO DISMISS

NOW COME Plaintiff, DOMINIC GAGLIARDOTTO, by and with his attorney, Daniel A. Wolf of Schwartz Wolf & Bernstein LLP, and Defendants, GOOSE LAKE DEVELOPMENT, INC. d/b/a GLD, INC. and DRAGAN JOVANOVIĆ, individually, by and with their attorney, Anthony Michael Klytta of Klytta & Klytta LP, and stipulate and move as follows:

1. On November 3, 2020, Plaintiff filed its Complaint Under Fair Labor Standards Act and Illinois Minimum Wage Law ("Complaint") in this matter.
2. On February 1, 2021, Defendants filed their appearance by counsel but as of the date hercof have not filed an answer, motion, or other pleading in response to the Complaint.
3. Plaintiff and Defendants have agreed to resolve all claims raised in the Complaint on the terms set forth in a separate Settlement and Release Agreement executed contemporaneously with this Stipulation and Motion.
4. The parties stipulate to the entry of an order dismissing this matter, subject to reinstatement on motion only in the event of Defendant's default in payment under said Settlement Agreement in which event:
 - a. Defendants shall be deemed to have waived all defenses to the Complaint; and

- b. Plaintiff shall be entitled to entry of judgment against Defendants as in the case of default, subject to proof of damages as of the date of such judgment.

WHEREFORE, Plaintiff and Defendants, by and with their respective counsel, pray that this honorable court accept and enter the foregoing stipulation and dismiss this matter on the terms stated herein.

DATED: February 12, 2021



Dominic Gagliardotto

SCHWARTZ WOLF & BERNSTEIN LLP
Counsel for Plaintiff

By: _____

Daniel A. Wolf



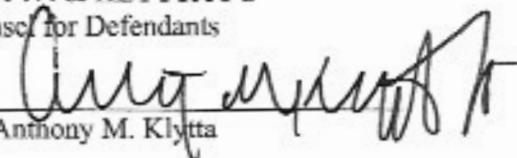
GOOSE LAKE DEVELOPMENT, INC.

By: Dragan Jovanovic, President

Dragan Jovanovic, Individually

KLYTTA & KLYTTA PC
Counsel for Defendants

By: _____



Anthony M. Klytta